

1 HEATHER E. WILLIAMS, Bar #122664  
2 Federal Defender  
3 BENJAMIN A. GERSON, NY Bar # 5505144  
4 Assistant Federal Defender  
5 Designated Counsel for Service  
6 2300 Tulare Street, Suite 330  
7 Fresno, CA 93721-2226  
8 Telephone: (559) 487-5561  
9 Fax: (559) 487-5950  
10  
11 Attorneys for Defendant  
12 RUBEN SUAREZ

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16  
17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 vs.  
20 RUBEN SUAREZ,  
21 Defendant.

22 Case No. 1:21-mj-00054 SKO

23 **STIPULATION TO CONTINUE STATUS  
24 CONFERENCE;**

25 Date: June 9, 2021  
26 Time: 2:00 p.m.  
Judge: Stanley A. Boone

27 **MOTION**

28 The parties, through their respective counsel, Antonio Pataca and Laurel Montoya, Assistant United States Attorneys, and Benjamin A. Gerson, Assistant Federal Defender, counsel for the defendant, Ruben Suarez, hereby jointly move this Court to continue the detention hearing scheduled on June 9, 2021 to June 10, 2021 at 2:00 p.m. to permit defense time for additional investigation and preparation.

The parties agree that the delay resulting from the continuance shall be excluded in the interests of justice, including but not limited to, the need for the period of time set forth herein for effective defense preparation, defense investigation, and plea negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

1  
2 Dated: June 7, 2021  
3

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

4 */s/ Benjamin A. Gerson*  
5 BENJAMIN A. GERSON  
6 Assistant Federal Defender  
7 Attorney for Defendant  
8 Ruben Suarez

9 Dated: June 7, 2021  
10

PHILLIP A. TALBERT  
Acting United States Attorney

9 */s/ Laurel Montoya*  
10 LAUREL MONTOYA  
11 Assistant United States Attorney

12  
13  
14  
15 **O R D E R**

16 **GOOD CAUSE APPEARING**, the joint motion to continue the detention hearing from  
17 June 9, 2021 to June 10, 2021 at 2:00 p.m. is granted.

18  
19 IT IS SO ORDERED.

20 Dated: June 8, 2021

  
21 UNITED STATES MAGISTRATE JUDGE